John H. Robinson, WSB # 6-2828 JAMIESON & ROBINSON, LLC 214 South Grant Street Casper, Wyoming 82601 307.235.3575 307.577.9435 FAX robinsn@vcn.com Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

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) Civil Case No. 14-CV-184-S
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PLAINTIFF'S EXPERT WITNESS DESIGNATION

COMES NOW Plaintiff, by and through his counsel of record, John H. Robinson of Jamieson & Robinson, LLC, and respectfully submits the following names, addresses and summaries of testimony, which the Plaintiff may use as expert witnesses, and testimony in the trial of the above captioned matter. Plaintiff may call the following expert witnesses. In compliance with W.R.C.P. 26 (a)(2)(B) and the Court's 7/6/2015 Amended IPTO, Plaintiff designates his expert witnesses as follows:

I. Police Practices Liability Expert

D.P. Van Blaricom Police Practices Expert 835 – 91st Lane North East Bellevue, Washington 98004-4811

The report of plaintiff's police practices liability expert is attached hereto as Exhibit 1. The report includes the opinions Van Blaircom will offer and basis of his opinions; the data or other information considered by him in forming his opinions. Please see Exhibit 2 for his qualifications, including publications authored; the compensation to be paid for his testimony; and a listing of other cases in which he has testified as an expert at trial or by deposition within the past four years.

In addition to those opinions expressed in his report, Van Blaircom reserves the right to modify or offer additional opinions in rebuttal or regarding matters not known to him at present.

It is anticipated that Van Blaricom will testify in accordance with his deposition, if taken.

RESPECTFULLY SUBMITTED this 21st day of September 2015.

JUAN PAUL FLORES, Plaintiff

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Counsel for Plaintiff